

Attorneys

Edward M. Nass
Michael A. Cancelliere, Jr.
Michael A. Rowe
Casey R. Coburn
Jennifer L. Stonage
Michael J. Brown

Of Counsel

David E. Brenner
Richard P. Hackman
Heather L. Kaplan
Edward R. Stankiewicz, M.D., J.D.
Eliot Present

March 22, 2018

Regional Freedom of Information Officer
U.S. EPA, Region 3
1650 Arch Street (3CG00)
Philadelphia, PA 19103
Via First Class Mail

Dear Sir or Madam:

Under the **Freedom of Information Act**, I am requesting an opportunity to inspect or obtain copies of public records that **pertain to the removal and/or abatement of asbestos and/or asbestos-containing products at the facility located at 555 Union Boulevard, Allentown, PA 18109 ("Allentown Facility")**, formerly known as **Allentown Works**. Since 1951, this facility has been owned by various entities, some of which include Western Electric, AT&T Inc., Alcate-Lucent, and Agrere Systems, Inc. As such, I am also requesting copies of all public records that in anyway relate to the former owners of the Allentown Facility. For purposes of this request, I am only interested in information from 1951 to the present day.

If there are any fees for searching or copying these records, please inform me if the cost will exceed \$50.00. This information is not being sought for commercial purposes. My law firm represents the family of Bella Poborets for an asbestos claim. Please provide these documents and/or information electronically or by CD, if possible.

If access to the records I am requesting will take longer than seven business days, please contact me with information about when I might expect copies or the ability to inspect the requested records.

If you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the information and notify me of the appeal procedures available to me under the law.

Thank you for considering my request.

Sincerely,



Michael J. Brown, Esq.